

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT NEW YORK

ROBERT BROWN and THE ESTATE OF
BOBBI KRISTINA BROWN

Plaintiffs,

v.

SHOWTIME NETWORKS, INC., BRITISH
BROADCASTING CORPORATION, PASSION
PICTURES CORP. TRACEY BAKER-
SIMMONS, WANDA SHELLEY, B2
ENTERTAINMENT, LLC, and SIMMONS
SHELLEY ENTERTAINMENT, LLC

Defendants.

Case No.: 1:18-cv- 011078-CM

ECF Case

SUPPLEMENTAL DECLARATION OF CLIVE ILLENDEN

I, CLIVE ILLENDEN, declare under 28 U.S.C. § 1746, as follows:

1. I am commercial and business affairs manager for defendant British Broadcasting Corporation (“BBC”) and have worked for BBC since 2006. I am familiar with the facts herein and make this declaration from my own personal knowledge.

2. BBC America is a television channel that is jointly owned by BBC Studios and AMC Networks. As I previously testified, BBC Studios is a commercial subsidiary of BBC, and it was not involved in the production or distribution of the documentary *Whitney*. “*Can I Be Me.*”

3. BBC World News is a television channel that is owned and operated by BBC Global News Ltd, a commercial subsidiary of BBC. BBC Global News Ltd was not involved in the production or distribution of the documentary *Whitney*. “*Can I Be Me.*”

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 14 day of May 2019.

A handwritten signature in black ink, appearing to read 'Clive Illenden', written over a horizontal line.

Clive Illenden